

## **REMARKS**

In reply to the Official Office Action of August 10, 2005, Applicants respond as follows:

Claims 1-3, 5-11, 12-13, 15-16, 19-21, 23-26, and 27-31 are rejected under 35 U.S.C. 103(a) as being unpatentable over WO 00/43131 by Kucera et al. in view of U.S. Patent 4,766,844 by Brewer et al.

Furthermore, claims 4, 15, 22, and 34 have been rejected under 35 U.S.C. 103(a) as being unpatentable over WO 00/43131 by Kurcera et al. in view of U.S. Patent 4,766,844 by Brewer et al. and further in view of U.S. Patent 4,657,788 by Benton et al.

Claims 17 and 18 are rejected under 35 U.S.C. 103(a) as being unpatentable over WO 00/43131 by Kucera et al. in view of U.S. Patent 4,766,844 by Brewer et al. and U.S. Patent 4,657,788 by Benton et al. and further in view of U.S. Patent 4,103,049 by Nishida et al.

Claims 32 and 33 are rejected under 35 U.S.C. 103(a) as being unpatentable over WO 00/43131 by Kucera et al. in view of U.S. Patent 4,766,844 by Brewer et al. and further in view of U.S. Patent 4,103,049 by Nishida et al.

Applicants respectfully disagree and have amended the claims to distinguish the invention from the applied references. For example, all of the independent claims have been amended to state that after removal of a substrate from an autodepositing composition said substrate is wet with independent claims 1 and 34 and the claims dependent therefrom and also dependent claims 24-27, 31, and 33 stating that the composition is an aqueous composition. All of the independent claims have further been amended to state that the wet substrate after removal from the autodepositing composition is articulated to provide a uniform coating thickness. That is, as set forth in the specification, at least in paragraphs 8 and 50, the substrate is rotated, moved, and otherwise articulated to substantially eliminate trapped air as well as to prevent the buildup of a drip line and thus result in a film generally having a uniform

thickness. None of the references, either singularly or collectively, teach or suggest this aspect.

The basic Kucera et al. reference relates to coating substrates but fails to teach or suggest any substrate after removal from an autodepositing composition which is subjected to articulation while it is wet. Rather, Kucera et al. relates to coating a substrate by dipping. See Examples 1-4. Nowhere is there set forth any suggestion of any articulation of a substrate after dipping nor of any articulation of a wet film or coating to yield a substantially uniform coating thickness.

Nor do any of the secondary references teach or suggest articulation of a wet coating. For example, the Brewer et al. reference merely relates to tinting metal leads by initial immersion in a flux, and subsequent immersion in molten metal. Upon removal thereof, the metal rapidly solidifies with an imparted drip line. There is no suggestion in Brewer with regard to any articulation of a wet film or coating after removal from a composition to yield a substantially uniform coating thickness. Rather, Brewer relates to the prior art which Applicants' invention has overcome.

It is respectfully submitted that the Kucera and Brewer references do not teach any motivation for combining as they must. In a nutshell, Brewer does not teach articulation of a wet composition and cannot inasmuch as the metal rapidly dries after removal from the molten vat. Kucera also lacks any teaching of articulating a wet coated substrate. Moreover, there is no teaching or suggestion of providing a substantially uniform coating.

The Benton reference is utilized as teaching an autodepositing coating on metal substrates by utilizing agitation while the substrate is immersed in a coating composition. However, there is no teaching or suggestion as set forth by Applicants' amended claims with regard to the utilization of a wet film after removal from the coating composition and articulation thereof to provide a substantially uniform coating.

The Nishida reference is further of no help inasmuch as it too lacks any suggestion of a substrate having a wet coating after removal from a coating

composition with articulation occurring during the wet period to provide a substantially uniform coating thickness.

All of the references further lack any teaching or suggestion of a second immersion or contact of the substrate as set forth in claims 5, 19, and the claims dependent therefrom.

In conclusion, none of the references teach or suggest, alone or in combination, a substantially uniform coating substantially free of entrapped air or a drip line.

In view of the above amendments and arguments, a formal notice of allowance is earnestly solicited.

Respectfully submitted,

**LORD CORPORATION**

A handwritten signature in black ink, appearing to read "Todd Galinski", with a stylized flourish at the end.

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